

KELLEY DRYE & WARREN LLP
A LIMITED LIABILITY PARTNERSHIP

April 3, 2025

The Honorable Vernon S. Broderick
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007

APPLICATION GRANTED
 SO ORDERED *Vernon S. Broderick*
 VERNON S. BRODERICK
 U.S.D.J.

Date: April 7, 2025

Re: *The Nielsen Company (US), LLC v. TVSquared Ltd.*, C.A. No. 1:23-cv-01581-VSB-SN

Dear Judge Broderick:

Plaintiff The Nielsen Company (US), LLC, (“Nielsen”) and Defendant TV Squared Ltd. (“TVSquared”) respectfully submit this joint letter-motion pursuant to Your Honor’s Individual Rules & Practices in Civil Cases to request to extend the stay in this case for an additional sixty-seven (67) days, through and including June 10, 2025, and to extend all deadlines in the Scheduling Order as shown below. The parties agree that the stay will apply to all interim deadlines, including the service of and responses and objections to written discovery. This is the parties’ fourth request to extend an existing stay in the case, and eighth request for an extension of time. *See* Dkt. 135, 159, 171, 186, 191. The court granted the previous seven requests. Dkt. 137-138, 160-161, 172-173, 189-190. In support of this letter-motion, the parties provide the following specific reasons for the stay and extension requests:

The parties are continuing to work towards a mutually agreeable resolution to this lawsuit. Nielsen and TVSquared have exchanged a draft Letter of Intent regarding possible terms, with specific milestone dates included in the letter to assist in progressing towards an agreement. While the parties are diligently working to progress towards a resolution, including technical proof-of-concept work, the parties currently do not have sufficient time to complete their technical work and continue their negotiations without incurring substantial costs associated with the close of fact discovery and expert reports. The parties therefore request that the Court extend the existing stay in the case for an additional 67 days, and further permit the parties to extend all remaining deadlines by approximately 67 days to allow for additional time to hold further discussions in lieu of incurring further costs associated with the litigation.

A list of existing deadlines in the procedural schedule, along with the proposed adjusted deadlines, is included below.¹ A proposed order reflecting these revised dates is attached hereto as Exhibit A.

ITEM	CURRENT DATE	PROPOSED DATE
Deadline to serve any interrogatories or requests for admission	June 3, 2025	August 8, 2025
Close of fact discovery	July 1, 2025	September 5, 2025

¹ In the event the parties are unable to resolve the case, Nielsen intends to ask the court to extend these deadlines further to give the parties more time to complete discovery. Nielsen has agreed to the proposed dates in this letter only to avoid a dispute that could unduly burden the court while the parties engage in good faith settlement discussions.

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ITEM	CURRENT DATE	PROPOSED DATE
Opening expert reports by party with burden of proof	August 19, 2025	October 24, 2025
Responsive expert reports by party without burden of proof	September 23, 2025	December 5, 2025
Close of expert discovery	November 11, 2025	January 24, 2026
Joint letter to court regarding dispositive motions	December 2, 2025	February 10, 2026
Telephonic post-discovery teleconference	December 16, 2025	February 23, 2026

Respectfully submitted,

/s/ Jason P. Greenhut

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